

US DISTRICT COURT FOR MASSACHUSETTS

Case no. 1:20-CV-12080-MLW

Dr. SHIVA AYYADURAI,)
Petitioner,)
v.)
WILLIAM F. GALVIN,)
in his official capacity as)
Secretary of State,)
Respondent.)

EMERGENCY MOTION FOR A PRELIMINARY INJUNCTION

On November 18, 2020, pursuant to state law, the various towns and counties in Massachusetts that conducted the 2020 election for the office of U.S. Senate transmitted their vote counts to Secretary of State William Francis Galvin for final certification in consultation with the Governor's Council. That final certification is expected this week.

In order to comply with the Constitution, Supreme Court rulings and 1st Circuit case law, the requested injunction must be issued, ordering Galvin to ensure a public, transparent hand-count of the paper ballots cast in the September 2020 Republican primary election and to stay certification of the U.S. Senate election result until that count is complete. The instant motion is a true emergency that must be granted in order to ensure the integrity of the voting process.

CONCLUSION

For the reasons detailed in the accompanying memorandum of law, the court must immediately issue the requested stay of certification and order a transparent hand-count of the paper ballots cast during the 2020 Republican primary election and the 2020 U.S. Senate election.

Respectfully submitted under the pains and penalties of perjury,

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U.S. DISTRICT COURT
DISTRICT OF MASS.

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/s/ Dr. Shiva Ayyadurai

November 23, 2020

Dr. Shiva Ayyadurai

Plaintiff, *pro se*

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